

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: Attorney General, Set #3

DATED: August 3, 2001

ITEM: AG-VZ 3-18 How does Verizon MA obtain information that an existing Verizon MA customer has changed local service provider from Verizon MA to a CLEC? How long after this information is first obtained by Verizon MA is it made available to Verizon MA sales and marketing personnel for purposes of initiating a "win-back" effort or for any other purpose?

REPLY: Verizon objects to this request on the grounds that it's overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

Without waiver of and subject to its objection, Verizon MA states that it, like all other CLECs, obtains information that an existing customer has changed local service providers when the new provider requests a transfer of service. In addition, Verizon MA may obtain information on lines lost to CLECs via a number of sources such as its customers, electronic media, print publications, etc.

VZ # 94

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Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: Attorney General, Set #3

DATED: August 3, 2001

ITEM: AG-VZ 3-19 For each month beginning in January 2000 and through the most recent period for which data is available, please provide the following information:

- a. The number of residential subscribers who have changed service provider from Verizon MA to a CLEC.
- b. The number of residential subscribers who have changed service provider from Verizon MA to a CLEC who are contacted by Verizon MA in an effort to "win them back" to Verizon MA.
- c. The number of residential subscribers who have received some form of "win-back" contact who return to Verizon MA within 30 days of receiving such contact.
- d. The compensation that is paid to a Verizon MA representative for each successful "win-back" of a residential customer by that representative. Please specify whether the compensation received by individual representatives is in the form of money, other goods and services, or other in-kind compensation.
- e. The number of business subscribers who have changed their service providers from Verizon MA to a CLEC.
- f. The number of business subscribers who have changed their service providers from Verizon MA to a CLEC who are contacted by Verizon MA in an effort to "win them back" to Verizon MA.

ITEM: AG-VZ 3-19
(cont'd)

- g. The number of business subscribers who have received some form of "win-back" contact who return to Verizon MA within 30 days of receiving such contact.
- h. The compensation that is paid to a Verizon MA representative for each successful "win-back" of a business customer by that representative. Please specify whether the compensation received by individual representatives is in the form of money, other goods and services, or other in-kind compensation.

REPLY:

- a. Verizon MA considers data responsive to this request proprietary and competitively sensitive. That data will be made available to the extent provided for in a mutually agreeable Protective Agreement.
- b-d. Verizon MA objects to these requests on the grounds that they are overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seek the disclosure of confidential and commercially sensitive material.
- e. Verizon MA considers data responsive to this request proprietary and competitively sensitive. That data will be made available to the extent provided for in a mutually agreeable Protective Agreement.
- f-h. Verizon MA objects to these requests on the grounds that they are overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seek the disclosure of confidential and commercially sensitive material.

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D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: Attorney General, Set #3

DATED: August 3, 2001

ITEM: AG-VZ 3-20 Has Verizon MA undertaken any quantitative studies regarding supply elasticities of CLECs operating in New Jersey (a) with respect to CLECs that only resell bundled Verizon MA services; (b) with respect to CLECs that provide resold services based solely upon VNJ UNE-P or other UNE arrangement with no CLEC facilities; (c) with respect to CLECs that utilize UNE-loops in conjunction with CLEC-owned switching equipment; and (d) with respect to CLECs that own their own outside plant distribution and/or transport facilities? Please provide complete copies of any and all such studies, identifying in each case the source of the information upon which Verizon MA has relied in reaching its findings.

REPLY: Verizon MA assumes that the reference to New Jersey in the Information Request is an error, and we are responding as though the question asked for data with respect to CLECs operating in Massachusetts.

Verizon MA has not undertaken any such study.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA
Respondent: Thomas Maguire
Title: Vice President Wholesale
Operations

REQUEST: Attorney General, Set #3

DATED: August 3, 2001

ITEM: AG-VZ 3-21 Please refer to the Verizon MA response to AG-VZ-1-11. Items (e), (j) and (o) request "the *number* of missed installation *dates*" (emphasis supplied) whereas the response is captioned "% Missed Installation *Appt*" (emphasis supplied). By way of clarification, by "missed installation dates" the AG-VZ-1-11 was referring to missed dates as the install date had been quoted at the time that Verizon MA received the order for the service (based either upon a standard installation interval or a specific installation date quoted by the Company).

- a. Please confirm that "Appt" which we take to mean "appointments" refers to the installation date quoted or expected (based upon standard intervals) as of the date of the original order, rather than an "appointment" made subsequent to the date of the original order for the specific customer premises visit by the Verizon MA craftsman.
- b. Please indicate whether "Appt" is the same as "FOC" (Firm Order Commitment) or something else. If these terms are different, please define each as regularly used by the Company.
- c. If there is a difference between "missed installation dates" and "missed installation appt," provide the data for "missed installation dates."
- d. If there is a difference between "missed FOC dates" and "missed

ITEM: AG-VZ 3-21
(cont'd)

installation appt," provide the data for "missed FOC dates."

- e. AG-VZ-1-11 requested the *number* of missed installation dates; the respect provided *percentages*. Please provide the actual numbers as requested.
- f. For each of the three categories of T-1 services addressed in AG-VZ-1-11 (*viz.*, Flexpath T-1, IntraLATA Special Access T-1, UNE T-1), provide a detailed step-by-step description of the processes undertaken by Verizon MA from and including the receipt of the original order for service (either from the end user in the case of Flexpath or from a carrier in the case of special access or UNE) through and including the installation, testing and final acceptance of the service at the premises at which it is installed. Indicate for each process the "standard" point in the order cycle (*i.e.*, days from original receipt of order) at which the activity is supposed to take place, and indicate, for each of the months for which data is provided in response to AG-VZ-1-11, the average point in the order cycle at which each of the specified activities actually took place.

REPLY:

- a. The data provided in AG-VZ 1-11 for Missed Installation Appointments were based upon the Carrier to Carrier ("C2C") definitions adopted in Massachusetts as part of D.T.E. 99-271. Please see Attachment 1 which provides the specific definition for metric PR-4 Missed Appointments from the C2C Guidelines.
- b. Please see Part (a).
- c. Please see Part (a).
- d. Please see Part (a).
- e. Verizon Massachusetts considers certain data responsive to this request proprietary and competitively sensitive. The data will be made available to the extent provided for in a mutually acceptable Protective Agreement.

Please see Attachment 2 which is a spreadsheet that provides the numerators and denominators used to determine the results reported in AG-VZ 1-11.

REPLY: AG-VZ 3-21
(cont'd)

- f. Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material. Without waiver of and subject to this objection, Verizon MA responds to this request as follows: Please see Attachment 3 which provides a comparison of the processes used in ordering and provisioning retail, Special Access and UNE T1's. Data is not available to determine the average point in the order cycle at which each of the specified activities took place.